



WESTON SOLUTIONS, INC.
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VIA FEDEX

March 1, 2017

Mr. Mark D. Fisher, CHMM, LSRP
The ELM Group
345 Wall Street, Research Park
Princeton, NJ 08540

Ms. Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Re: Woodbridge Pond Revised Conceptual Remediation Plan
Fords, NJ
Program Interest Number G000003943

Dear Mr. Fisher and Ms. Schulz:

Weston Solutions, Inc. (Weston) has prepared this Woodbridge Pond Revised Conceptual Remediation Plan based on Weston's discussions with Woodbridge Township (the owner of the property). The intent of this revised conceptual remediation plan is to physically remove sediments containing polychlorinated biphenyls (PCBs) and bis(2-ethylhexyl) phthalate (BEHP) at concentrations above the goals established for unrestricted use. This approach is consistent with the Township's planned future use of the property and applicable regulatory requirements.

Upon acceptance of this approach by the property owner, LSRP, and regulators, a Remedial Action Workplan (RAWP) Addendum No. 4 will be prepared to describe the remediation approach in detail and will be distributed for their review and approval.

Weston proposes removing sediments via focused wet dredging or equivalent technology. The wet sediment will be stabilized using TenCate Geotube®, filter press or similar dewatering technology. After stabilizing, the impacted sediments will be reused in the former Lagoon Area and disposed off-site at an approved disposal facility.

REMEDIATION GOALS

The site-specific clean-up goal for PCB concentrations in pond sediment of 1 milligram per kilogram (mg/kg) was presented in Weston's August 2009 RAWP Addendum No. 3 and was approved by both the United States Environmental Protection Agency (USEPA) and New Jersey



Department of Environmental Protection (NJDEP) in 2010. Through technical consultation with NJDEP on March 6, 2015, Weston with concurrence from Mark Fisher, LSRP, recommended a site-specific remediation standard of 22 mg/kg for BEHP in Woodbridge Pond sediments. The technical basis for this recommendation was summarized in the memorandum dated May 7, 2015.

EXTENT OF REMEDIATION

The distribution of PCB and BEHP-contaminated sediments within Woodbridge Pond is shown on the attached Figure 1. More than 80 sediment cores were advanced during investigations of Woodbridge Pond between June 2007 and March 2014. Analytical results from these sediment cores indicated PCB and BEHP contamination above the remediation goals of 1 mg/kg PCBs and 22 mg/kg BEHP, respectively, was found in sediments in the eastern and central portions of the pond, to depths up to 4.5 feet below the sediment surface. The horizontal and vertical extent of the excavation limits have been delineated using the sediment sampling results (Figures 1) and dredging excavation limits will be extended to the nearest sample with no exceedances.

Consistent with the NJDEP's Technical Guidance for Site Investigation of Soil, Remedial Investigation of Soil, and Remedial Action Verification Sampling for Soil March 2015, Version 1.2, confirmatory samples will be collected to confirm the limits of removal. The samples will be collected every 30 linear feet of sidewall/perimeter of the proposed excavation limits, and one sample will be collected every 900 square feet from the bottom of the proposed excavation footprint. The confirmatory samples will be collected during the pre-design phase prior to commencing excavation/dredging activities, consistent with the referenced NJDEP Technical Guidance, which allows for Remedial Investigation (RI) samples to be used in place of post-excavation sampling.

Pre-design confirmatory samples will be collected as necessary to supplement the existing sediment sampling data. Existing sediment samples and supplemental pre-design samples will be used in lieu of post excavation samples to define the limits of the remediation. The samples will be collected from the top and bottom of each sidewall to demonstrate vertical compliance with the remediation goals. Based upon the existing sampling data supplemental pre-design sediment samples will be collected from pre-determined surveyed locations and elevations to establish the horizontal and vertical limits of the material to be dredged. If sampling results exceed the remediation goal additional samples will be collected to confirm the extent of contamination. No samples will be collected after the dredging/removal work. The locations of the existing and proposed confirmatory samples are indicated on Figure 1. Weston will prepare a pre-design sampling plan that designates each of the sample locations, elevations and purpose.

The excavation/dredging will extend to the pre-determined limits established by pre-design and existing sampling data. The excavation will extend to bottom of the clean sampling interval, thus



no post excavation samples will be collected after completing dredging activities. This will allow complete removal of the contaminated sediments in one mobilization, reducing the overall remediation timeframe.

REMEDIATION APPROACH

The remedial activities envisaged for this work include but are not limited to the following:

- Pre-design sampling to establish horizontal and vertical limits of the remediation;
- Site preparation including installation of erosion and sedimentation controls;
- Removal of fish and amphibians;
- Limited clearing and grubbing to access the pond and to establish work zones;
- Set up of construction support area and dewatering equipment on the adjacent Hatco property;
- Wet dredging of sediments using Mud Cat™ or similar equipment;
- Sediments will be wet dredged and pumped directly to the dewatering equipment on the Hatco site (Geotube®, filter press, or similar technology);
- Water from the dewatering process will be collected, treated and discharged back to the pond in accordance with the pending discharge to surface water permit;
- Up to 500 cubic yards of dewatered sediments will be placed into the former Lagoon Area for reuse;
- Dredged sediments in excess of 500 cubic yards will be disposed off-site at an approved disposal facility; and
- Site and wetland areas will be restored in accordance with permit requirements.

As discussed above, Weston will establish a 30- by 30-foot sampling grid across the portion of the pond to be remediated. PCB and BEHP data from more than 200 samples previously collected from the pond bottom will be supplemented through pre-design sampling to establish the horizontal and vertical limits of the remedial action. The horizontal position and vertical elevations of the excavation limits will be established in the field by a licensed surveyor. Figure 1 shows the anticipated horizontal limits of the excavation, the sampling grid and the locations of existing and proposed delineation samples. The limits will be adjusted as appropriate based on the results of the pre-design sampling.

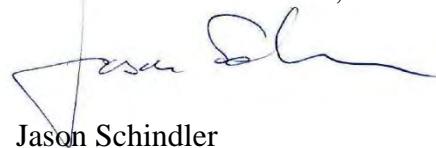
Weston anticipates that removal of sediments can be accomplished effectively via focused wet dredging, or equivalent technology. Weston proposes using Mud Cat™ or similar equipment for dredging the sediment from the Woodbridge Pond. Mud Cat™ will be equipped with bottom weighted turbidity curtains to minimize sediment transport. The excavation limits will extend to the horizontal and vertical limits determined by the pre-design sampling.

The following permits and approvals will be secured to implement this project:

- USEPA and LSRP approval of Remedial Action Work Plan Addendum No. 4
- Flood Hazard Area Individual Permit
- Scientific Collection Permit
- Water Lowering Permit
- NJPDES Discharge to Surface Water General Groundwater Remediation Clean-up (BGR) permit
- Wetlands Letter of Interpretation
- Freshwater Wetlands Hazardous Site Investigation and Cleanup General Permit 4
- Soil Erosion and Sediment Control Plan certification
- Local construction, fire and electric permits

If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.



Jason Schindler
Principal Project Manager

Figure 1: Pre-Design Confirmatory Sediment Sample Locations

cc: J. Haklar, USEPA
A. Findley, NJDEP
C. Ehrlich, Woodbridge Township
M. Mauro, Excel Environmental
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